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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

### Division of Oil, Gas and Mining

JOHN R. BAZA  
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March 19, 2013

Scott Parsons  
Staker Parsons Companies  
89 West 13490 South, Suite 100  
Draper, Utah 84020

Subject: Sixth Review and Name Change of Notice of Intention to Commence Large Mining Operations, Staker Parsons Companies, Beef Hollow Facility (Point West), M/035/0042, Salt Lake County, Utah

Dear Mr. Parsons:

The Division of Oil, Gas and Mining has completed a review of the referenced Notice of Intention to Commence Large Mining Operations (NOI) for the Beef Hollow Facility, which was received on March 8, 2013. The name change from Point West is approved. The attached comments will need to be addressed before tentative approval may be granted.

Thank you for submitting the NOI formatted to follow the R647 rules, and the comments in this review are likewise organized. Please address those items requested in the attached technical review. Please feel free to call if you need clarification on any of the issues identified.

Because the plan is nearly ready for tentative approval, the Division suggests that you submit two complete, clean (redline/strikeout removed) copies of the NOI when you respond to this review. Changes may be noted in a table or using a copy of the review. Upon final approval, two copies of the NOI will be stamped "approved," and one will be returned for your records.

The Division will suspend further review until your response is received. Please contact Leslie Heppler at 801-538-5257 or me at 801-538-5261 if you have any questions about the review. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker  
Minerals Program Manager

PBB: lah: eb  
Attachment: Review  
cc City of Herriman  
P:\GROUPS\MINERALS\WP\M035-SaltLake\M0350042-BeefHollowFacility(Point West)\final\REV6-5342-031312013.doc





**Sixth REVIEW OF NOTICE OF INTENTION  
TO COMMENCE LARGE MINING OPERATIONS**

**Staker Parsons Company  
Beef Hollow Mine (formerly Point West)  
M/035/0042  
March 19, 2013**

**General Comments:**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
1	General	Submittal should be formatted to easily incorporate additional revisions and amendments.	lah	
2	General	The Division may have additional comments based on submittals received in the future. Please make every effort to submit a complete NOI.	lah	
3	General	Please submit good quality color copies on the final revision.	lah	
4	Appendix C	Please include a map corresponding with the well locations shown in Appendix C. The table in Appendix C should be labeled Appendix C rather than D. Page 19 of the text references this map in Appendix D which should be Appendix C (see comment 21 below).	lah	
5	All	The Division recommends the term "operator" be used instead of "SPC." Using "operator" allows the site to be transferred to another entity without as many changes to the NOI.	lah	

**R647-4-105 - Maps, Drawings & Photographs**

**105.1 - Topographic base map, boundaries, pre-act disturbance**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
6	Fig 2	The Division recommends removing the "LTC" name from the map and keep "Camp Williams, Department of Public Works."	lah	

**105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
7	Figure 3	The sediment basin sizes and locations shown on Figure 3 are inconsistent with those shown on Figure 8. Two examples are that some sediment basins are not shown on Figure 3, and the location of the Basin 6 sediment basin is not the same. Correct both maps accordingly.	pnb	
8	Figure 8	Any springs or other hydrology features within 500 ft of the permit boundary should be identified on this map. Make a negative declaration on this map if there are none.	pnb	



Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
9	Figure 8	The channel that runs from Camp Williams and onto the far east end of the proposed permit area has been filled by an existing road construction. The map should identify the location of the culvert or drain beneath the road, if one exists. If no culvert or drain exists, the potential impoundment should be labeled and treated as a retaining pond or sediment basin, and storm water calculations will need to be provided.	pnb	
10	Figure 8	Without seeing the calculations and more detail, it appears that the sediment basin for the largest stream channel (originating on the Camp Williams property) may be smaller than it should be, when compared to the other sediment basins and the watershed sizes. Determine whether this is the case and correct the map accordingly.	pnb	
11	Figure 8	The watershed boundary on the map for watershed 6 (Existing Drainage Basin 6)—which appears to include parts but not all of the watershed associated with the drainage from Camp Williams—doesn't match the acreage included in the table on the map. The Basin 6 watershed should be identified correctly. Feel free to call the Division to discuss.  If values and coverage for the contributing area change as a result, calculations will need to be updated.	pnb	
12	Figure 8	The map and legend do not identify a unique line or color for the watershed boundary, and as a result, the blue lines are identified in the legend as silt fence locations. Also, the blue boundaries don't seem to make sense, such as where they cross the highway and out of the permit boundary at the lowest elevations. More clearly distinguish the watershed (basin) boundaries, and correct accordingly.	pnb lah	
13	Figure 9	The final contours map (Figure 9) identifies the road along the south boundary as remaining after reclamation. Until an agreement has been reached regarding existing roads at the site, road reclamation will need to be included in the reclamation bond.	pnb	
14	Figure 9	Please label ephemeral drainages on the legend.	lah	
15	Fig 11,12,13	As written in the previous review, "Please use horizontal and vertical labels for all slope angles, e.g. 2H:1V." Please label only the slopes that are steeper than 20H:1V with the maximum slope angle such as 2H:1V max., i.e. the labels for the flatter slopes are not needed and restrict the operator in the future.	lah	
16	Figure 9	Please provide the calculations and assumptions for the drainage basin statistics and the design flows shown on Figure 9.	pnb	
17	Figure 9	Include culverts sizing and sediment pond capacity to support Figure 9, and include in Appendix E.	pnb	

### 106.3 - Estimated acreages disturbed, reclaimed, annually

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
18	Table 1	As written in the previous review, "At the last inspection, there were several stockpiles of topsoil within the permit boundary from soil that was salvaged by CMC. Many of the previously disturbed small mine areas had the topsoil reapplied. Please add the estimated volume of topsoil to be salvaged." To restate: the Division needs to have volume calculations for the number of acres to be disturbed. The text notes 589 acres, Table 1 indicate 292 acres and Figure 7 has 671 acres, and no topsoil volumes are indicated. This comment also applies to page 17, Section 106.6.	lah	



**106.5 - Existing soil types, location, amount**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
19	Page 15	As written in the previous review, "The soils data provided indicate that there is significantly more soil available for salvage than the 6" average currently in the text of the NOI. Only one of the seven soil types had 6" or less of available soil; the other six all had in excess of 12" (three soil types had over 3 feet). Please plan to salvage all available soils so that there is a minimum of 12" of soil to spread over all areas to be revegetated. At the last inspection it was noted that the topsoil depth in many of the drainages exceeds ten feet. (there are also many rocky ridges that have less than 2" of topsoil)." To restate: the Division needs volume calculations for the amount of topsoil needed for areas to be disturbed.	Lk & lah	

**106.6 - Plan for protecting & re-depositing soils**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
20	Page 24	The plan says "... no slopes greater than 3H:1V will exist. ..." This statement is inconsistent with the cross sections.	lah	

**106.8 - Depth to groundwater, extent of overburden, geology**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
21	Page 19	Typographical error: change Appendix D to Appendix C in the text on this page, and change on the title of the table in Appendix C. This page also references a letter from Sarah Lindsay and says it is in Appendix E, but it is in Appendix D. As there could be other mistakes of this sort in the text, please do a search to ensure the appendices are properly referenced.	lah	

**R647-4-109 - Impact Assessment**

**109.4 - Slope stability, erosion control, air quality, safety**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
22	Pg 26	Will water be used for dust suppression on the roads? If so, please state under 109.4.	lah	

**109.5 - Actions to mitigate any impacts**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
23		Submit a cultural resource survey when received.	lah	

**R647-4-110 - Reclamation Plan**

**110.3 - Description of facilities to be left (post mining use)**

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action



Sixth Review  
Page 5 of 5  
M/035/0042  
March 19, 2013

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
24	Pg 28	Concrete slabs will need to be broken up, but can be left in place, with a cover of three feet of common fill <b>and</b> an additional one foot of topsoil placed above the common fill.	lah	

#### 110.5 - Revegetation planting program

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
25	Page 29	This section says topsoil or topdressing will be tested prior to being spread, but soil analysis information is in Section 106.5. Please modify the plan accordingly.		
26	Suggest adding	The Division recommends that an interim seed mix be planted wherever feasible on disturbed areas to reduce weed growth.	lah	

#### 113 – Surety

Comm ent #	Sheet/Page/ Map/Table #	Comments	Initials	Review Action
27	Appendix G	On the surety summary sheet, include the total number of acres of disturbance. It could be on the lines with 2012 (“Total Cost 2012” and “2012 Dollars”).	lah	
28	Appendix G	Rock check dams, ditches, and ravines (but not silt fences and culverts) are identified as water control structures that will be left in place (page 27). The removal of silt fences, culverts, and other excluded water control structures has not been included in the reclamation cost so far. Sediment ponds that do not need to remain will also need to be included in the cost estimate.	pnb	